

D. Blair Clark
RINGERT CLARK CHARTERED
455 South Third, P.O. Box 2773
Boise, ID 83701
Phone: (208) 342-4591
Fax: (208) 342-4657
Idaho State Bar No. 1367
Attorneys for Gary and Verlene Kaiser

U.S. COURTS

20 JUL 19 PM 4:24

RECEIVED
CAMERON S. BURKE
CLERK IDAHO

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO**

In re:

COMMUNITY HOME HEALTH, INC.

Debtor.

Case No. **98-02141**

**RESPONSE TO OBJECTION
TO PROOF CLAIM**

Comes now Verlene D. Kaiser, and responds to the Objection filed by the Trustee, as follows:

A. The issues and the periods of these claims, as compared with Claim 135, are totally unrelated. These particular claims are for work done by the claimant for the benefit of the estate after the petition was filed. Almost all of these charges were generated by claimant doing appeals to the Administrative Law Judges of Medicare denials, which benefitted the estate. In fact, there were several administrative appeals, almost all of which were resolved in Trustee's favor.

B. The §507(a)(3) claims were for prepetition work. However, these claims show, on their face, that they were for periods after the petition was filed, and while the affairs of the company

VBK

were being wound up by the Trustee.

C. The amount is totally proper. There were hundreds of hours put in on this project.

D. These claims are allowed priority under §§507(a)(1) and 503(b).

WHEREFORE, claimant prays the objection be denied.

Dated this 19 Day of July, 2000.

RINGERT CLARK CHARTERED,

by 

D. Blair Clark

Attorneys for Gary and Verlene Kaiser

CERTIFICATE OF MAILING

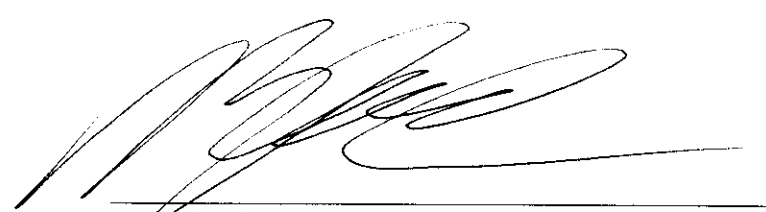
I hereby certify that on the 19 day of July, 2000, I caused to be mailed by U.S. Mail, postage prepaid, a true and correct copy of the within and foregoing, to the following:

Jed W. Manwaring
Attorney at Law
P.O. Box 959
Boise, ID 83701

U.S. Trustee
P.O. Box 110
Boise, ID 83701

Bernie R. Rakozy
P.O. Box 1738
Boise, ID 83701

Gary and Verlene Kaiser
2739 Starcrest Dr.
Boise, ID 83712


D. Blair Clark